

KOLESAR & LEATHAM, CHTD.
 3320 West Sahara Avenue, Suite 380
 Las Vegas, Nevada 89102
 Tel: (702) 362-7800 / Fax: (702) 362-9472

1 NATALIE M. COX, ESQ.
 Nevada Bar No. 007662
 2 PETER D. NAVARRO, ESQ.
 Nevada Bar No. 010168
 3 **KOLESAR & LEATHAM, CHTD.**
 3320 W. Sahara Avenue, Suite 380
 4 Las Vegas, Nevada 89102
 Telephone: (702) 362-7800
 5 Facsimile: (702) 362-9472
 E-mail: ncox@klnevada.com
 6 pnavarro@klnevada.com

7 Attorneys for Defendants
 CHASE HOME FINANCE, LLC d.b.a.
 8 WASHINGTON MUTUAL; JPMORGAN
 CHASE d.b.a. WASHINGTON MUTUAL;
 9 HEATHER MCLENDON, individually, and as
 an agent of CHASE HOME FINANCE, LLC
 10 d.b.a. WASHINGTON MUTUAL and/or
 JPMORGAN CHASE d.b.a. WASHINGTON
 11 MUTUAL; GREG TANNER, individually, and
 as an agent of CHASE HOME FINANCE, LLC
 12 d.b.a. WASHINGTON MUTUAL and/or
 JPMORGAN CHASE d.b.a. WASHINGTON
 13 MUTUAL

14 **UNITED STATES DISTRICT COURT**
 15 **DISTRICT OF NEVADA**

16 MARC A. SAGGESE, an individual,

17 Plaintiffs,

18 vs.

19 CHASE HOME FINANCE, LLC d.b.a.
 WASHINGTON MUTUAL; JPMORGAN
 20 CHASE d.b.a. WASHINGTON MUTUAL;
 HEATHER MCLENDON, individually, and as
 21 an agent of CHASE HOME FINANCE, LLC
 d.b.a. WASHINGTON MUTUAL and/or
 22 JPMORGAN CHASE d.b.a. WASHINGTON
 MUTUAL; GREG TANNER, individually,
 23 and as an agent of CHASE HOME FINANCE,
 LLC d.b.a. WASHINGTON MUTUAL and/or
 24 JPMORGAN CHASE d.b.a. WASHINGTON
 MUTUAL; MIKE HART, individually, and as
 25 an agent of PROFESSIONAL RECOVERY
 SERVICES, INC.; PROFESSIONAL
 26 RECOVERY SERVICES, INC.; DOES I-X
 and ROE CORPORATIONS 1-10, inclusive,

27 Defendants.
 28

Case No.: 2:09-cv-01884-RCJ-PAL

**STIPULATION AND ORDER TO
 DISMISS CASE AND STAY
 FORECLOSURE PROCEEDINGS**

**STIPULATION AND ORDER TO DISMISS CASE AND
STAY FORECLOSURE PROCEEDINGS**

Defendants, CHASE HOME FINANCE, LLC, JPMORGAN CHASE BANK, N.A. AS ACQUIRER OF CERTAIN ASSETS OF WASHINGTON MUTUAL BANK FROM THE FEDERAL DEPOSIT INSURANCE CORPORATION, ACTING AS RECEIVER, erroneously named as JPMORGAN CHASE ("JPMorgan Chase"), HEATHER MCLENDON and GREG TANNER (collectively "Chase Defendants") and Plaintiff MARC A. SAGGESE ("Plaintiff"), by and through their respective counsel, hereby jointly stipulate as follows:

1. That Plaintiff's Complaint be dismissed without prejudice.
2. That Chase Defendants shall refrain from initiating or conducting any further actions to foreclose on the property that is the subject matter of this litigation and located at 417 Grand Augusta Lane in Las Vegas, Nevada 89144 until March 1, 2011.

DATED this 21 day of December, 2010.

CRISTALLI & SAGGESE, LTD

MICHAEL V. CRISTALLI, ESQ.
Nevada Bar No. 006266
ROBERT J. FLUMMERFELT, ESQ.
Nevada Bar No. 11122
732 S. Sixth Street, Suite 100
Las Vegas, Nevada 89101

Attorneys for Plaintiff

DATED this 21 day of December, 2010.

KOLESAR & LEATHAM, CHTD.

NATALIE M. COX, ESQ.
Nevada Bar No. 007662
PETER D. NAVARRO, ESQ.
Nevada Bar No. 010168
3320 W. Sahara Avenue, Suite 380
Las Vegas, Nevada 89102

Attorneys for Defendants

IT IS SO ORDERED this 22nd day of December, 2010.


Gloria M. Navarro
United States District Judge

KOLESAR & LEATHAM, CHTD.
3320 West Sahara Avenue, Suite 380
Las Vegas, Nevada 89102
Tel: (702) 362-7800 / Fax: (702) 362-9472